

quinn emanuel trial lawyers | new york

295 5th Avenue, New York, New York 10016-7103 | TEL (212) 849-7000 FAX (212) 849-7100

WRITER'S DIRECT DIAL NO.
(212) 849-7150

WRITER'S EMAIL ADDRESS
michaelcarlinsky@quinnemanuel.com

January 10, 2025

VIA ECF

The Honorable Jessica G. L. Clarke
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 11B
New York, New York 10007

Re: *Doe v. Black*, Case No. 1:23-cv-06418-JGLC

Dear Judge Clarke:

I represent Defendant Leon Black in the above-referenced matter. I write to respectfully request that the Court immediately seal ECF No. 189, a letter submitted by Jane Doe's counsel yesterday that contains sensitive personal and identifying information, until the parties meet and confer as to proposed redactions.

The attachments to ECF No. 189 contain the cell phone numbers and home addresses of several non-party individuals. *See* ECF No. 189-1 at 2-6; ECF No. 189-2 at 2-5. The publication of this personal identifying information violates Local Rule 5.2 and this Court's Individual Rules. *See* 2013 Committee Note to Local Rule 5.2 (“[B]efore filing a letter via ECF, parties should consider whether the letter contains . . . personal information . . . that should not be in the public file, in which case the letter should be sent directly to chambers instead of via ECF.”); Individual Rule 5(a) (“The parties should not include, unless necessary, the five categories of ‘sensitive information’ in their submissions (i.e., social security numbers, names of minor children [use the initials only], dates of birth [use the year only], financial account numbers and home addresses [use only the City and State]).”); Individual Rule 5(b) (“Without Court approval, parties may redact the five categories of ‘sensitive information’ and the six categories of information requiring caution (i.e., personal identifying number . . .), as described in the Privacy Policy.”).

The references to personal phone numbers and home addresses should accordingly be redacted and the letter should be sealed in its entirety until a corrected, redacted version is filed. *See Robinson v. De Niro*, 2023 WL 3728350, at *1 (S.D.N.Y. May 26, 2023) (granting motion to redact personal information such as home addresses and phone numbers).

quinn emanuel urquhart & sullivan, llp

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Respectfully submitted,

/s/ Michael B. Carlinsky

Michael B. Carlinsky

Cc: All Counsel